

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

ROBERT HAUGHIE,	*	
Plaintiff,	*	
v.	*	Civil No. ELH-18-3963
WEXFORD HEALTH SOURCES, INC., <i>et al.</i>	*	
Defendants.	*	

\* \* \* \* \*

**MOTION TO DISMISS**

Defendant, Department of Public Safety and Correctional Services (DPSCS), by its attorneys, Brian E. Frosh, Attorney General of Maryland, and Dorianne A. Meloy, Assistant Attorney General, move, pursuant to Fed.R.Civ.P. 12(b), to dismiss the complaint filed herein. The grounds of the Motion are:

1. The complaint fails to state a claim upon which the relief prayed can be granted.
2. The Defendant is immune from suit.
3. Plaintiff has failed to plead compliance with the Maryland Tort Claims Act.
4. Plaintiff's claims are partially barred by the Statute of Limitations.

**WHEREFORE**, the Defendant DPSCS prays that this Court dismiss the complaint against it. In support of this Motion, Defendant submits the accompanying Memorandum of Law.

Respectfully submitted,  
  
BRIAN E. FROSH  
Attorney General of Maryland

/s/

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DORIANNE A. MELOY  
Assistant Attorney General  
Federal Bar No. 16362

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Attorneys for Defendant

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